

EXHIBIT 12

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

STATE OF CALIFORNIA;
COMMONWEALTH OF
MASSACHUSETTS; STATE OF NEW
JERSEY; STATE OF COLORADO; STATE
OF ILLINOIS; STATE OF MARYLAND;
STATE OF NEW YORK; and STATE OF
WISCONSIN,

Plaintiffs,

v.

Case No. 1:25-cv-10548

U.S. DEPARTMENT OF EDUCATION;
DENISE CARTER, in her official capacity
as former Acting Secretary of Education and
current acting Chief Operating Officer,
Federal Student Aid; LINDA MCMAHON,
in her official capacity as Secretary of
Education,

Defendants.

DECLARATION OF EDMUNDO GARCIA-SOLIS

I, Edmundo Garcia-Solis, declare as follows:

1. I am a resident of the State of Illinois. I am over the age of 18 and have personal knowledge of all the facts stated herein, except to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by Chicago State University (“CSU”) as Associate Provost of Grants and Research Administration. I am a Professor of Physics and Department Chair of Chemistry, Physics, and Engineering Studies at Chicago State University. In addition to my primary responsibilities, I lead strategic planning and implementation of major research initiatives. I also support and strengthen CSU’s grant portfolio.

3. CSU is a public university with its campus located on the South Side of Chicago, Illinois. In the fall of 2024, CSU enrolled almost 3,000 undergraduate and graduate students from 38 states and 35 countries.

4. CSU is a Predominantly Black Institution. As defined by 20 U.S.C. § 1059e, a Predominantly Black Institution has a student body that is, among other things, at least 40 percent African American and at least 50 percent low income or first generation. CSU’s student body is 68 percent African American and 48 percent first generation.

5. CSU transforms students’ lives by innovative teaching, research, and community partnerships through excellence in ethical leadership, cultural enhancement, economic development, and justice. As an anchor institution, CSU is a catalyst of economic growth and social progress. CSU graduates not only achieve personal success; they also significantly contribute to a more diverse workforce and leadership landscape.

6. In 2023, the United States Department of Education (“ED”) awarded a Teacher Quality Partnership (“TQP”) Grant to Cook County School District 104 (“District 104”). District 104 is an elementary school district that serves the municipalities of Summit, Bedford Park, and Bridgeview in southwestern Cook County, Illinois. According to data reported by the Illinois State Board of Education at www.isbe.net, as of the 2024-25 school year, District 104 enrolls 1,423 students, of whom more than 87 percent are Hispanic and more than 78 percent are low income (meaning they are eligible to receive free or reduced-price lunches, they live in substitute care, or their families receive public aid).

7. District 104’s TQP grant is a partnership with Maywood–Melrose Park–Broadview School District 89 (“District 89”). District 89 is an elementary school district that serves the municipalities of Maywood, Melrose Park, and Broadview in western Cook County, Illinois. According to data reported by the Illinois State Board of Education at www.isbe.net, as of the 2024-25 school year, District 89 enrolls 4,096 students, of whom about 66 percent are Hispanic, 29 percent are Black, and 59 percent are low-income under the definition set forth above.

8. District 104's TQP grant is also a partnership with CSU, which is a subrecipient of District 104's TQP grant. The subaward anticipates CSU will receive funds totaling approximately \$928,834 over the course of the grant's performance period running from October 1, 2023, through September 30, 2028.

9. As explained and represented by ED, the purpose of a TQP grant was to incentivize and cause institutions, including universities such as CSU, to implement and undertake programs and initiatives with the objective of improving student achievement at the K-12 level by, among others things, supporting and enhancing the professional development of current teachers, recruiting and training new highly qualified teachers, and recruiting highly qualified individuals in other professions into the teaching profession, especially for hard-to-fill subject areas, like math, science, and special education, and in hard-to-staff school districts in rural and urban areas.

10. The goal of District 104's TQP grant is to create a teacher preparation partnership known as the Teacher Education Alliance Model ("TEAM") among District 104, District 89, and CSU, in collaboration with nine community partners including Triton College, a public community college that serves 25 municipalities in western Cook County, Illinois.

11. The grant is being used to create an integrated, comprehensive system of recruiting, preparation, induction, and on-going mentoring of a diverse pool of participants in an innovative teacher preparation program that will prepare 300 apprentice teachers to become multi-subject or single subject certified teachers employed in the high-need schools of District 104 and District 89, where teacher attrition is high and student achievement is low. The expectation is that all 300 apprentice teachers supported by the grant will agree to teach for three additional years as full-time educators in either District 104 or District 89.

12. District 104's TQP grant adopts a distinctive approach in that it will diversify the educator workforce in shortage areas in participating schools, using a team and interdisciplinary approach to teaching and learning emphasizing how students can create meaningful academic and social/emotional knowledge. TEAM will immerse its apprentice teachers in the culture of the cities and communities in which they will be teaching and learning. In this way, new teachers are more likely to become committed, motivated, and better prepared to serve the students in the highest need districts.

13. CSU supports the goals of District 104's TQP grants in a variety of ways. Faculty from CSU's College of Education have worked collaboratively to redesign courses in early childhood education, elementary and middle school education, and bilingual education for apprentice teachers participating in the teacher preparation program created by District 104's TQP grant. Among other things, these curriculum redesign efforts have involved aligning the curriculum with Interstate Teacher Assessment and Support Consortium standards, Illinois Learning Standards, Illinois Culturally Responsive Teaching and Leading Standards, Technology Standards, and national specialty organization standards. In addition, CSU faculty are working on embedded English as a Second Language and Reading Teacher endorsements, as well as middle school science and mathematics endorsements.

14. CSU is also working with other partners in District 104's TQP grant to develop a comprehensive Summit Institute for teachers. The institute will focus on teacher preparation, culturally responsive pedagogy, middle school, special education, early childhood, and bilingual education, as well as integration of the arts. CSU also provides wrap-around services to apprentice teachers participating in the program, including advising, field placement, field supervision, professional development workshops, test-taking strategies, and licensure examination review.

15. CSU has at all times complied with all aspects of its subaward relating to District 104's TQP grant, and the work CSU has performed under the subaward has at all times conformed to the highest applicable standards. CSU has never been informed by ED, District 104, or any other person or entity that its work in connection with its subaward has been deficient or problematic in any way.

16. On February 12, 2025, ED issued a revised Grant Award Notification ("GAN") to District 104, terminating its TQP grant. District 104 provided a copy of the revised GAN to CSU. A true and correct copy of the revised GAN is attached as Exhibit A.

17. The revised GAN provides: "THE BUDGET PERIOD AND PERFORMANCE PERIOD FOR THIS PROJECT ARE CHANGED TO THE DATES IN BLOCK 6 [both of which end on February 12, 2025]. NO ADDITIONAL FUNDS ARE PROVIDED BY THIS ACTION." The revised GAN further provides: "The grant is deemed to be inconsistent with, and no longer effectuates, Department priorities. See 2 C.F.R. 200.340(a)(4); see also 34 C.F.R. 75.253."

18. CSU relied and acted upon its expectation and understanding that ED would fulfill its commitment to provide TQP grant funding it had awarded to District 104. The grant funding was suspended in the middle of our Year 2 activities, which directly impacts our ability to sustain academic support functions for our apprentice teacher candidates, teacher development activities for our school district partner cooperating teachers and our CSU faculty and staff in both the College of Education and the College of Arts & Sciences. The grant activities that are directly impacted include:

a. The College of Education and the College of Arts & Sciences have been systematically redesigning our curriculum for all our initial licensure programs to meet the new Illinois Culturally Relevant Teaching & Leading Standards. This project involves faculty in both Colleges. The loss of funding means that faculty who have already completed work or are in the process of completing the work will not be paid.

b. Recruitment and Retention Activities with our partner schools to identify members of the school community, such as paraprofessionals and other education professionals, to help them navigate through the hurdles of admission, financial aid, and other barriers to get back in school to complete their education credentials to become licensed teachers. The loss of funding directly impacts faculty and academic support personnel. CSU will not be able to hire a project support advisor/mentor coach.

c. The Center for Urban Literacy ("CUL") was set to provide workshops and academic support for our apprentice teacher candidates, our partner school district

cooperating teachers and staff, and our CSU faculty. In addition, CUL had planned to coordinate learning experiences with our school district partners to model teaching and learning practices with our CSU teacher candidates with PK-12 student learners' needs in reading and literacy. The Center was also in development to offer a two-week Summit Institute for teachers in Summer 2025, our TQP apprentice teacher candidates, and our school district partners to focus on reading and literacy skills and culturally relevant teaching and assessment experiences. The loss of funding impacts the ability to purchase educational teaching materials and resources as well as support the CUL director and other faculty contributions to the work.

d. The CSU College of Education was in the process of re-establishing our Urban Schools Journal through the grant. The editor is a faculty member who was granted release time to research the technical steps to formally establish the Journal, as well as develop mechanisms with faculty to incorporate our teacher candidates to be active participants in the conducting research, writing literature reviews and journal articles, and serving as peer reviewers for both internal and external article proposals.

e. And, we will have to immediately cease the work in creating an integrated, comprehensive system of recruiting, preparation, induction, and on-going mentoring of a diverse pool of participants in an innovative teacher preparation program that would have prepared 300 apprentice teachers to become multi-subject or single subject certified teachers employed in local high-need schools.

19. As mentioned earlier, CSU's total subaward amount for the 5-year grant project is \$928,834. To date, CSU has drawn down \$86,831 of that amount. The remaining funds will be unavailable to CSU if the TQP grant is not restored.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Executed on March 4, 2025, at Chicago, Illinois.

/s/ Edumundo Garcia-Solis

Edmundo Garcia-Solis

Exhibit A

S336S230063 - 24
Jon Baricovich
Cook County School District 104
6021 S 74th Avenue
Summit, IL 60160

S336S230063 - 24

Jon Baricovich
Cook County School District 104
6021 South 74th Avenue
Summit, IL 60501



**US Department of Education
Washington, D.C. 20202**

S336S230063 - 24

GRANT AWARD NOTIFICATION

1	RECIPIENT NAME Cook County School District 104 6021 South 74th Avenue Summit, IL 60501	2	AWARD INFORMATION PR/AWARD NUMBER S336S230063 - 24 ACTION NUMBER 4 ACTION TYPE Administrative AWARD TYPE Discretionary								
3	PROJECT STAFF RECIPIENT PROJECT DIRECTOR Jon Baricovich (708) 458-0506 jbaricovich@sd104.us EDUCATION PROGRAM CONTACT Diana Schneider (202) 401-1456 diana.schneider@ed.gov EDUCATION PAYMENT HOTLINE G5 PAYEE HELPDESK 888-336-8930 obssed@servicenowservices.com	4	PROJECT TITLE 84.336S Teacher Educator Alliance Model (TEAM)								
5	KEY PERSONNEL <table> <thead> <tr> <th><u>NAME</u></th> <th><u>TITLE</u></th> <th><u>LEVEL OF EFFORT</u></th> </tr> </thead> <tbody> <tr> <td>Jon Baricovich</td> <td>Project Director</td> <td>0 %</td> </tr> </tbody> </table>			<u>NAME</u>	<u>TITLE</u>	<u>LEVEL OF EFFORT</u>	Jon Baricovich	Project Director	0 %		
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**US Department of Education
Washington, D.C. 20202**

S336S230063 - 24

GRANT AWARD NOTIFICATION

10

PR/AWARD NUMBER: S336S230063 - 24
 RECIPIENT NAME: Cook County School District 104
 GRANTEE NAME: COOK COUNTY SCHOOL DISTRICT #104
 7505 W 63RD ST,
 SUMMIT, IL 60501 -
 PROGRAM INDIRECT COST TYPE: Restricted
 PROJECT INDIRECT COST RATE: 8%

TERMS AND CONDITIONS

- (1) THE BUDGET PERIOD AND PERFORMANCE PERIOD FOR THIS PROJECT ARE CHANGED TO THE DATES IN BLOCK 6. NO ADDITIONAL FUNDS ARE PROVIDED BY THIS ACTION.
- (2) The grant is deemed to be inconsistent with, and no longer effectuates, Department priorities. See 2 C.F.R. 200.340(a)(4); see also 34 C.F.R. 75.253.

AUTHORIZING OFFICIAL

DATE

EXPLANATION OF BLOCKS ON THE GRANT AWARD NOTIFICATION

For Discretionary, Formula and Block Grants (See Block 2 of the Notification)

- 1. RECIPIENT NAME** - The legal name of the recipient or name of the primary organizational unit that was identified in the application, state plan or other documents required to be submitted for funding by the grant program.
- 2. AWARD INFORMATION** - Unique items of information that identify this notification.
 - PR/AWARD NUMBER** - A unique, identifying number assigned by the Department to each application. On funded applications, this is commonly known as the "grant number" or "document number." The PR/Award Number is also known as the Federal Award Identifying Number, or FAIN.
 - ACTION NUMBER** - A numeral that represents the cumulative number of steps taken by the Department to date to establish or modify the award through fiscal or administrative means. Action number "01" will always be "NEW AWARD"
 - ACTION TYPE** - The nature of this notification (e.g., NEW AWARD, CONTINUATION, REVISION, ADMINISTRATIVE)
 - AWARD TYPE** - The particular assistance category in which funding for this award is provided, i.e., DISCRETIONARY, FORMULA, or BLOCK. If this award was made under a Research and Development grant program, the terms RESEARCH AND DEVELOPMENT will appear under DISCRETIONARY, FORMULA OR BLOCK.
- 3. PROJECT STAFF** - This block contains the names and telephone numbers of the U.S. Department of Education and recipient staff who are responsible for project direction and oversight.
 - *RECIPIENT PROJECT DIRECTOR** - The recipient staff person responsible for administering the project. This person represents the recipient to the U.S. Department of Education.
 - EDUCATION PROGRAM CONTACT** - The U.S. Department of Education staff person responsible for the programmatic, administrative and business management concerns of the Department.
 - EDUCATION PAYMENT CONTACT** - The U.S. Department of Education staff person responsible for payments or questions concerning electronic drawdown and financial expenditure reporting.
- 4. PROJECT TITLE AND CFDA NUMBER** - Identifies the Catalog of Federal Domestic Assistance (CFDA) subprogram title and the associated subprogram number.
- 5.* KEY PERSONNEL** - Name, title and percentage (%) of effort the key personnel identified devotes to the project.
- 6. AWARD PERIODS** - Project activities and funding are approved with respect to three different time periods, described below:
 - BUDGET PERIOD** - A specific interval of time for which Federal funds are being provided from a particular fiscal year to fund a recipient's approved activities and budget. The start and end dates of the budget period are shown.
 - PERFORMANCE PERIOD** - The complete length of time the recipient is proposed to be funded to complete approved activities. A performance period may contain one or more budget periods.
 - *FUTURE BUDGET PERIODS** - The estimated remaining budget periods for multi-year projects and estimated funds the Department proposes it will award the recipient provided substantial progress is made by the recipient in completing approved activities, the Department determines that continuing the project would be in the best interest of the Government, Congress appropriates sufficient funds under the program, and the recipient has submitted a performance report that provides the most current performance information and the status of budget expenditures.
- 7. AUTHORIZED FUNDING** - The dollar figures in this block refer to the Federal funds provided to a recipient during the award periods.
 - *THIS ACTION** - The amount of funds obligated (added) or de-obligated (subtracted) by this notification.
 - *BUDGET PERIOD** - The total amount of funds available for use by the grantee during the stated budget period to this date.
 - *PERFORMANCE PERIOD** - The amount of funds obligated from the start date of the first budget period to this date.
 - RECIPIENT COST SHARE** - The funds, expressed as a percentage, that the recipient is required to contribute to the project, as defined by the program legislation or regulations and/or terms and conditions of the award.
 - RECIPIENT NON-FEDERAL AMOUNT** - The amount of non-federal funds the recipient must contribute to the project as identified in the recipient's application. When non-federal funds are identified by the recipient where a cost share is not a legislation requirement, the recipient will be required to provide the non-federal funds.
- 8. ADMINISTRATIVE INFORMATION** - This information is provided to assist the recipient in completing the approved activities and managing the project in accordance with U.S. Department of Education procedures and regulations.
 - UEI** - The UEI, issued in SAM.gov, is a unique 12 character organization identifier assigned to each recipient for payment purposes.

***REGULATIONS** - Title 2 of the Code of Federal Regulations(CFR), Part 200 as adopted at 2 CFR 3474; the applicable parts of the Education Department General Administrative Regulations (EDGAR), specific program regulations (if any), and other titles of the CFR that govern the award and administration of this grant.

***ATTACHMENTS** - Additional sections of the Grant Award Notification that discuss payment and reporting requirements, explain Department procedures, and add special terms and conditions in addition to those established, and shown as clauses, in Block 10 of the award. Any attachments provided with a notification continue in effect through the project period until modified or rescinded by the Authorizing Official.

9. LEGISLATIVE AND FISCAL DATA - The name of the authorizing legislation for this grant, the CFDA title of the program through which funding is provided, and U.S. Department of Education fiscal information.

FUND CODE, FUNDING YEAR, AWARD YEAR, ORG.CODE, PROJECT CODE, OBJECT CLASS -

The fiscal information recorded by the U.S. Department of Education's Grants Management System (G5) to track obligations by award.

AMOUNT - The amount of funds provided from a particular appropriation and project code. Some notifications authorize more than one amount from separate appropriations and/or project codes. The total of all amounts in this block equals the amount shown on the line, "THIS ACTION" (See "AUTHORIZED FUNDING" above (Block 7)).

10. TERMS AND CONDITIONS - Requirements of the award that are binding on the recipient.

***PARTICIPANT NUMBER** - The number of eligible participants the grantee is required to serve during the budget year.

***GRANTEE NAME** - The entity name and address registered in the System for Award Management (SAM). This name and address is tied to the UEI registered in SAM under the name and address appearing in this field. This name, address and the associated UEI is what is displayed in the SAM Public Search.

***PROGRAM INDIRECT COST TYPE** - The type of indirect cost permitted under the program (i.e. Restricted, Unrestricted, or Training).

***PROJECT INDIRECT COST RATE** - The indirect cost rate applicable to this grant.

***AUTHORIZING OFFICIAL** - The U.S. Department of Education official authorized to award Federal funds to the recipient, establish or change the terms and conditions of the award, and authorize modifications to the award

FOR FORMULA AND BLOCK GRANTS ONLY:

(See also Blocks 1, 2, 4, 6, 8, 9 and 10 above)

3. PROJECT STAFF - The U.S. Department of Education staff persons to be contacted for programmatic and payment questions.

7. AUTHORIZED FUNDING

CURRENT AWARD AMOUNT - The amount of funds that are obligated (added) or de-obligated (subtracted) by this action.

PREVIOUS CUMULATIVE AMOUNT - The total amount of funds awarded under the grant before this action.

CUMULATIVE AMOUNT - The total amount of funds awarded under the grant, this action included.

10. AFFILIATE - If an affiliate digital signature appears on this GAN, it is the digital signature belonging to the individual delegated the authority to affix the Authorizing Official's signature to the GAN.

* This item differs or does not appear on formula and block grants.